

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

KIMBERLY LADEHOFF and)
THE VILLAGE OF LOMBARD, an Illinois)
Municipal Corporation,)
Plaintiffs,) Case No: 08 CV 2077
v.) Judge Lefkow
GLENN CARTER,) Plaintiffs Demand
Defendant.) Trial By Jury

MOTION TO RESCHEDULE PROVE-UP ON MOTION FOR DEFAULT JUDGMENT

Now Comes Plaintiff, the Village of Lombard, an Illinois Municipal Corporation, by and through its attorneys, Klein, Thorpe and Jenkins, Ltd. and as its Motion to Reschedule Prove-Up on Motion for Default Judgment state the following:

1. On July 3, 2008, this Court granted Plaintiffs' Motion for Default Judgment. In addition, the Court set the matter for prove-up on July 22, 2008 and ordered all supporting affidavits to be submitted by July 17, 2008.
2. On July 22, 2008, the Court granted Plaintiffs' request to reschedule the hearing and set the hearing date for August 26, 2008.
3. Since that time, Plaintiffs have been discussing the goals and objectives for the prove-up hearing and the type of relief that Plaintiffs will request at the prove-up hearing. Plaintiffs are planning to meet to discuss these issues next week and will then need time to obtain the necessary affidavits and to prepare a proposed, draft order for the Court.
4. Plaintiffs request that the Court reschedule the Prove-Up on their Motion for Default Judgment to a date approximately thirty days after the date of August 26 set by the Court.

5. Counsel for the Village of Lombard has consulted with counsel for Ms. Ladehoff, William Anaya, and he agrees with the Village's request to reschedule the hearing.

WHEREFORE, the Village of Lombard, an Illinois Municipal Corporation, prays that the Court reschedule the Prove-Up on their Motion for Default Judgment to a date approximately thirty (30) days after August 26, 2008 and for any further relief the Court deems appropriate.

Respectfully submitted,

THE VILLAGE OF LOMBARD

By: KTH
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